1		
2	William B. Curtis, Esq. (TX SBN 00783918) (admitted pro hac vice)	
3	CURTIS LAW GROUP 12225 Greenville Ave., Suite 750	
4	Dallas, Texas 75243 Telephone: (214) 890-1000	
5	Facsimile: (214) 890-1010 Counsel for Plaintiff Darla Brown	
6	Counsel for I laining Dana Brown	
7	IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF ARIZONA	
8		
9	IN RE: BARD IVC FILTER PRODUCTS LIABILITY LITIGATION	
10		
11	This document relates to:	MDL No. 2:15-MD-02641-PHX-DGC
12	DARLA BROWN	Civil Action No. 2:17-cv-01506-DGC
13	Plaintiff,	STIPULATION OF DISMISSAL WITHOUT PREJUDICE
14	v.	
15	C.R. BARD AND BARD PERIPHERAL VASCULAR, INC.	
16	Defendants.	
17		
18		
19	IT IS HEREBY STIPULATED AND AGREED by and between Plaintiff Darla Brown, and	
20	Defendants, C.R. Bard and Bard Peripheral Vascular, Inc., through their undersigned counsel, that	
21	the above-captioned action is voluntarily dismissed, without prejudice, pursuant to Federal Rule of	
22	Civil Procedure 41(a)(1)(A)(ii), and without costs or fees to any party.	
23	Dated this 19 th day of September, 2017.	
24		
25		
26		
27		
28		
	1	

1	Respectfully submitted,	
2		
3	/s/ William B. Curtis	
3	WILLIAM CURTIS, Esq. Texas State Bar No. 00783918	
4	CURTIS LAW GROUP	
5	12225 Greenville Ave., Suite 750	
	Dallas, TX 75243	
6	(214) 890-1000 Telephone (214) 890-1010 Facsimile	
7	bcurtis@curtis-lawgroup.com	
8	ATTORNEY FOR PLAINTIFF	
9	/s/ Richard B. North	
10	Richard B. North, Jr., GA Bar #545599	
11	Nelson Mullins Riley & Scarborogh, LLP 2017 17 th St. NW, Suite 1700	
11	Atlanta, GA 30363	
12	Tel: 404-322-6000	
13	Fax: 404-322-6050	
	Richard.north@nelsonmullins.com Attorneys for Defendants	
14	Tittorneys for Bereindands	
15	CERTIFICATE OF SERVICE	
16	I have by consists that an this 10th day of Santonshan 2017. I also the misself the day of the	
17	I hereby certify that on this 19 th day of September, 2017, I electronically transmitted the	
18	attached document to the Clerk's Office using the CM/ECF System which will automatically send	
19	email notification of such filing to all attorneys of record.	
20	/s/ William Curtis	
21	WILLIAM CURTIS	
22		
23		
24		
25		
26		
27		
28		
	1	